

TABLE A\*: 2011 DEC Minors Inspection Coverages

| Permit Type                     | DEC Goal <sup>1</sup> | Facilities Inspected <sup>2</sup> | Percent of DEC Goal |
|---------------------------------|-----------------------|-----------------------------------|---------------------|
| AKG57s – Domestic               | 28 <sup>3</sup>       | 12                                | 43%                 |
| AKG52s - Seafood                | 29 <sup>4</sup>       | 6                                 | 21%                 |
| AKG37s – Mining                 | 5 <sup>5</sup>        | 9                                 | >100%               |
| AKG70s - LTFs                   | 2 <sup>6</sup>        | 0                                 | 0%                  |
| Pretreatment                    | 0 <sup>7</sup>        | 0                                 | NA                  |
| Minor IPs                       | 4                     | 3                                 | 75%                 |
|                                 |                       |                                   |                     |
| <b>Traditional Minor Totals</b> | 68                    | 30                                | 44%                 |
|                                 |                       |                                   |                     |
| AKR05 – MSGP                    | 56 <sup>8</sup>       | 55                                | 98%                 |
| AKR10 – CGP                     | 58 <sup>9</sup>       | 46 <sup>10</sup>                  | 79%                 |
| <b>Stormwater Minor Totals</b>  | 114                   | 101                               | 86%                 |

Note: Inspection counts only include APDES/NPDES permitted facilities and do not include multiple inspections of one facility in the calendar year if multiple inspections are identified, EPA-lead inspections, unpermitted site inspections, etc.

Note: The DEC Percent of Goal reflects Traditional Minor Totals' final inspection counts in comparison with DEC's projected CMS inspections for the calendar year.

Note 1: DEC's December 30, 2010 Letter with CY 2011 CMS ("DEC 2011 CMS").

Note 2: DEC SFY 2011 End-Year Inspections Report (Final 7/28/2011), "Inspections Report based on Inspections Performed from 7/1/2010 to 6/30/2011" (4 pages, dated 7/28/2011) and DEC SFY 2012 End-Year Report (July 2012), "Inspections Report based on Inspections Performed from 7/1/2011 to 6/30/2012" (4 pages, dated 7/19/2012).

Note 3: DEC 2011 CMS identifies a universe of 114 facilities.

Note 4: DEC 2011 CMS identifies a universe of 204 facilities.

Note 5: DEC 2011 CMS identifies an approximate 4200 placer mines as permitted with approximately 1000 mines active at any time. The DEC 2011 CMS acknowledges that under a

CMS goal of 20%-per-year, DEC would need to do a minimum of 200 inspections per year if the universe were only active sites.

Note 6: DEC 2011 CMS identifies a universe of 74 facilities with current discharge authorizations and states that seven (7) LTFs may be active in CY 2011.

Note 7: The City of Fairbanks Golden Heart Utility WWTF (AK0023451) was the only approved pretreatment program in 2011.

Note 8: DEC 2011 CMS identifies a universe of 206 facilities.

Note 9: The DEC 2011 CMS indicated that CGP inspections would be done “as time allows.” The DEC 2011 CMS stated that DEC plans to conduct CGP inspections with the goal of meeting both Phase I 10% and Phase II 5% inspection coverages. The DEC 2011 CMS states that if the CGP inspection goals appear to adversely affect DEC’s ability to inspect facilities on its CY 2011 inspection list, then DEC would focus on meeting the specific inspections in the CY 2011 inspection list.

Note 10: The DEC inspection summary report shows that this 46 inspection count includes nine (9) CGP inspections conducted by one DEC inspector on one day (July 15, 2011) under nine separate CGP coverages assigned to one permittee at one named facility (West Park). DEC has clarified that these facilities were primarily individual residential construction sites for which no formal inspection report was prepared by the on-site DEC inspector.

(\*) This table is associated with draft background document C (Non-Majors Inspection Coverage Measures). The table is subject to further updating, revisions and clarifications based on additional information, review and feedback, including DEC feedback.